

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

THOMSON REUTERS ENTERPRISE)	
CENTRE GMBH and WEST PUBLISHING)	
CORPORATION,)	C.A. No. 20-613-SB
)	
Plaintiffs/Counterdefendants,)	JURY TRIAL DEMANDED
)	
v.)	PUBLIC VERSION
)	
ROSS INTELLIGENCE INC.,)	
)	
Defendants/Counterclaimant.)	

**DECLARATION OF JIMOH OVBIAGELE IN SUPPORT OF ROSS INTELLIGENCE,
INC.'S OPPOSITION TO COUNTERDEFENDANTS'
MOTION FOR SUMMARY JUDGMENT ON ROSS'S ANTITRUST
COUNTERCLAIMS (NO. 4) – INJUNCTIVE RELIEF**

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ROSS Intelligence, Inc.*

Dated: September 28, 2023

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I, Jimoh Ovbiagele, declare as follows:

1. I submit this Declaration in support of ROSS Intelligence, Inc.’s (“ROSS”) Opposition to Counterdefendants’ Motion to Summary Judgment on ROSS’s Antitrust Counterclaims (No. 4) – Injunctive Relief. I am over eighteen years old and have personal knowledge of the facts set forth below, and, if called to testify, I could and would testify competently to the below.

2. I was the Chief Technology Officer and co-founder of ROSS, and currently I am on ROSS’s Board of Director. I was responsible for the creation of the ROSS legal search engine. I also continue to work on and develop artificial intelligence applications, and, therefore, I am familiar with the various artificial intelligence markets. The information that is set forth in this declaration is based on my personal knowledge, my education, experience, training, testing, and tenure at ROSS.

3. ROSS technology remains valuable, particularly given the boom in artificial intelligence technology.

4. [REDACTED]

[REDACTED]

5. Although ROSS does not have active business operations today, it has maintained its website, and its domain is registered until 2026; it has continued to store its data properly and securely; and it has kept its technology intact and protected in a GitHub repository.

6. Moreover, [REDACTED]

[REDACTED]

7. [REDACTED]

[REDACTED]

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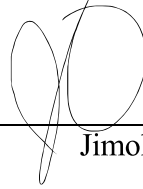
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8. For these reasons, [REDACTED]

[REDACTED]

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed at Toronto, Ontario on this 27th day of September, 2023.



Jimoh Ovbiagele